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8 THE NATURE CONSERVANCY

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11

12 Does 1-150, Individual Persons,

13 Plaintiffs,

14 v.

15 UNITED STATES DEPARTMENT OF
INTERIOR ("INTERIOR"), a federal agency;
16 DOUG BURGUM, Secretary of the Interior;
NATIONAL PARK SERVICE, a federal
17 agency; JESSICA BOWRON, Acting Director
of the National Park Service; DAVID
18 SZYMANSKI, Regional Director, Pacific West
Region; THE NATURE CONSERVANCY, a
19 District of Columbia nonprofit corporation,

20 Defendants.
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Case No. 3:25-cv-01115-MMC

**STIPULATION AND ~~PROPOSED~~
ORDER SETTING BRIEFING
SCHEDULE ON PENDING MOTIONS
TO DISMISS AND TO STAY
DISCOVERY**

Complaint Filed: February 3, 2025

Trial Date: None set.

Judge: Hon. Maxine M. Chesney

STIPULATION

Federal Defendants and The Nature Conservancy have filed motions to dismiss Plaintiffs' Complaint and to stay discovery until the Court rules on the motions to dismiss. ECF Nos. 36, 44, 45, and 46. At the Case Management Conference on May 9, 2025, the Court scheduled these four motions for hearing on August 1, 2025, and directed the parties to negotiate and file a briefing schedule.

The parties have met and conferred and have agreed to the following briefing schedule:

- Plaintiffs' opposition to the pending motions to dismiss and stay shall be filed on or before **June 20, 2025**; and
- Defendants' replies shall be filed on or before **July 18, 2025**.

IT IS SO STIPULATED.

Dated: May 13, 2025

HANSON BRIDGETT, LLP

By: /s/ Christopher D. Jensen
Christopher D. Jensen

Attorneys for Plaintiffs
DOES 1-150

Dated: May 13, 2025

JONES DAY

By: /s/ Thomas M. Donnelly
Thomas M. Donnelly

Attorneys for Defendant
THE NATURE CONSERVANCY

1 Dated: May 13, 2025

U.S. DEPARTMENT OF JUSTICE

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22 FEDERAL DEFENDANTS
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FILER'S ATTESTATION

I, Thomas M. Donnelly, am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Order Setting Briefing Schedule on pending Motions to Dismiss and to Stay Discovery. In compliance with Local Rule 5.1., I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: May 13, 2025

JONES DAY

By: /s/ Thomas M. Donnelly
Thomas M. Donnelly

~~[PROPOSED]~~ ORDER

Having considered the parties' Stipulation and [Proposed] Order Setting Briefing Schedule on pending Motions to Dismiss and to Stay Discovery, filed with this Court on May 13, 2025, and good cause appearing therefor,

IT IS SO ORDERED.

Dated: May 13, 2025


HON. MAXINE M. CHESNEY
U.S. District Court Judge

NAI-5000904316v1